

**REMARKS:**

In the outstanding Office Action, the Examiner rejected claims 1-19. Claims 1-4, 8-14, 16, 17 and 19 are amended herein, and claims 5-7, 15 and 19 are cancelled herein without prejudice. No new matter is presented.

Thus, claims 1-4, 8-14 and 16-18 are pending and under consideration. The rejections are traversed below.

**OBJECTION TO CLAIM 17:**

On page 2 of the outstanding Office Action, the Examiner objected to claim 17 due to informalities. Claim 17 is amended herein.

Therefore, withdrawal of the rejection is respectfully requested.

**REJECTION UNDER 35 U.S.C. § 101:**

Claims 17-19 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Claim 17 and 19 are amended herein, and as mentioned above, claim 18 is cancelled herein.

Therefore, withdrawal of the rejection is respectfully requested.

**REJECTION UNDER 35 U.S.C. §103(a):**

- A. Claims 1-3, 6, 9, 14 and 17 as being unpatentable over U.S. Patent Pub. No. 2002/0075514 (Wright) and further in view of U.S. Patent Pub. No. 2002/0180803 (Kaplan).

Wright does not teach or suggest "a file I/O unit which inputs and outputs a file from said clients" and "a processing unit which stores the file input from the file I/O unit into the file storage unit in conformity with a predefined processing rule", as recited in claim 1. See also independent claims 14 and 17 reciting similar features.

Instead, Wright discusses instructions for processing and storage of a document image where the instructions indicate preferences for images that have been supplied by the users for their images such as performing image cleaning and clarification, rotating the image, and performing optical character recognition on the image (see, paragraphs 15, 94 and 98).

As discussed above, the independent claims patentably distinguish over Wright. Further, as Kaplan merely discusses embedded or dedicated devices for playback of multimedia content or other suitable devices (see, paragraphs 6 and 30), Kaplan does not cure the deficiencies of Wright regarding the independent claims of the present application.

It is respectfully submitted that Kaplan and Wright do not teach or suggest the above-discussed features including forcing execution of "a predefined additional processing corresponding to one or more file types when an instruction of the additional processing is determined", "domains of the file storage unit corresponding to file types into dated domains based on date information of the input files", as taught by the claimed invention.

Further, even assuming arguendo that Kaplan does disclose the features discussed by the Examiner, the Applicants respectfully submit that there is no motivation to combine the cited references. The Examiner stated that the combination of the references would be obvious because one would have been motivated to provide means to allow a user to automatically execute media files without additional intervention.

MPEP §2143.01 states that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some reasoning that leads to a legal conclusion of obviousness. Therefore, as there is no requisite reasoning to combine the references cited by the Examiner, the Applicants respectfully request the withdrawal of the Examiner's §103 rejections.

Therefore, withdrawal of the rejection is respectfully requested.

B. Claims 7, 8, 10, 12, 13, 15 and 18 as being unpatentable over Wright, Kaplan further in view of U.S. Patent No. 6,965,770 (Walsh).

As mentioned above, claims 7, 15 and 18 are cancelled herein.

Walsh adds nothing to the teachings of Wright and Kaplan. In particular, Walsh only discusses sorting songs by genre, artist, etc., based on hierarchical identifiers (see, col. 5, lines 41-42).

However, the cited references do not teach or suggest system and method that "sorts the input files" including "music files" in divided domains, including handling "instructions" pertaining to the files from clients as taught by the claimed invention (see, claims 8, 10, 12 and 13).

Therefore, withdrawal of the rejection is respectfully requested.

- C. Claims 4, 5, 11, 16 and 19 as being unpatentable over various combinations of the following: Wright, Kaplan, Walsh, U.S. Patent Pub. No. 2003/0018746 (Boesch), U.S. Patent No. 6,831,754 (Delaney), non-patent literature from Microsoft including Windows XP (Microsoft).

In Boesch, input data files are stored in accordance with the kind (see, paragraph 23). In contrast the present invention "stores the input file in a domain of the file storage unit corresponding to each file type" (claim 4). Meaning, upon receipt of a signal from the client, the server generates a file name, and stores entered data files divided into areas of dates on the basis of the date information of the entered data file. This configuration is not disclosed in any of the cited references.

On the other hand, Delaney only discusses a processing apparatus with an additional processing specified in advance (see, col. 5, lines 5-9). Delaney does not teach or suggest, for example as recited in claim 11, "when the input file is an image file, the additional processing instruction unit forces the processing unit to print out by the printer."

The invention of claim 11, for example, when the user wishes to perform printing by a printer simultaneously with file storage, processing other than file storage can be executed by "an additional processing" by switch operation of the server in advance, thereby causing printing output by the printer simultaneously with file storage.

Moreover, since Microsoft merely discusses personal folders that are created by a user and profile of users when more than one person uses a computer, Microsoft does not add to the teachings of the other references with respect to the claimed invention.

The cited references do not teach or suggest generation of a file name by the server upon receipt of a signal from the client, or storing of entered data files as divided into date areas based on the date information of the entered data file.

Therefore, withdrawal of the rejection is respectfully requested.

- D. Dependent claims:

For at least the above-mentioned reasons, claims depending from independent claims are patentably distinguishable over the cited references. The dependent claims are also independently patentable. For example, as recited in claim 4, "the processing unit stores the input file in a domain of the file storage unit corresponding to each file type." The cited references, alone or in combination, do not teach or suggest storing the input file in "a domain... corresponding to each file type", as recited in claim 4.

Therefore, withdrawal of the rejection is respectfully requested.

**CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

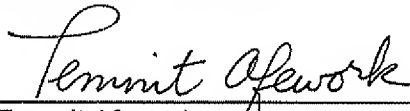
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 02/29/2008

By:   
Temnit Afework  
Registration No. 58,202

1201 New York Avenue, N.W., 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501